UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK

RULE 7.1 DISCLOSURE STATEMENT OF DEFENDANTS FAIRFIELD RISK SERVICES LTD. AND FAIRFIELD HEATHCLIFF CAPITAL LLC

Pursuant to Rule 7.1 of the Federal Rules of Civil Procedure, the undersigned counsel for Defendants Fairfield Risk Services Ltd. and Fairfield Heathcliff Capital LLC certifies as follows:

Fairfield Risk Services Ltd. is a wholly-owned subsidiary of Fairfield Greenwich

Limited. No publicly held corporation owns 10 percent or more of Fairfield Risk Services Ltd.'s stock.

Fairfield Heathcliff Capital LLC is a wholly-owned subsidiary of Fairfield Greenwich Limited. No publicly held corporation owns 10 percent or more of Fairfield Heathcliff Capital LLC's stock.

Dated: New York, New York

December 23, 2009

Respectfully submitted,

SIMPSON THACHER & BARTLETT LLP

By: /s/ Mark G. Cunha

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